

**From:** [Horwitz, Matthew \(USAOHS\)](#)  
**To:** [Michele Young](#)  
**Cc:** [ptoren@petertoren.com](mailto:ptoren@petertoren.com); [Koller, Kevin \(USAOHS\)](#)  
**Subject:** RE: Chen v. USA, 1:19-cv-45  
**Date:** Monday, May 20, 2019 8:59:04 AM

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Michele and Peter,

We calculated that your brief in response to the United States' Motion to Dismiss was due Friday. Please advise regarding the status of this matter.

Matt

Matthew J. Horwitz  
Assistant United States Attorney  
U.S. Attorney's Office for the Southern District of Ohio  
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[Matthew.Horwitz@usdoj.gov](mailto:Matthew.Horwitz@usdoj.gov)

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**From:** Michele Young <michele@michelelyounglaw.com>  
**Sent:** Monday, April 1, 2019 12:00 PM  
**To:** Horwitz, Matthew (USAOHS) <MHorwitz@usa.doj.gov>  
**Cc:** ptoren@petertoren.com; Koller, Kevin (USAOHS) <KKoller@usa.doj.gov>  
**Subject:** Re: Chen v. USA, 1:19-cv-45

Fine!

- Michele Young

On Apr 1, 2019, at 9:35 AM, Horwitz, Matthew (USAOHS) <[Matthew.Horwitz@usdoj.gov](mailto:Matthew.Horwitz@usdoj.gov)> wrote:

Michelle,

I hope you had a good weekend.

Attached is a draft stipulation for extension of time. Please let me know if this looks ok to file.

Thank you again for your agreement on this.

Matt

Matthew J. Horwitz

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**From:** Michele Young <[michele@michelelyounglaw.com](mailto:michele@michelelyounglaw.com)>  
**Sent:** Friday, March 29, 2019 3:31 PM  
**To:** Horwitz, Matthew (USAOHS) <[MHorwitz@usa.doj.gov](mailto:MHorwitz@usa.doj.gov)>  
**Cc:** [ptoren@petertoren.com](mailto:ptoren@petertoren.com); Koller, Kevin (USAOHS) <[KKoller@usa.doj.gov](mailto:KKoller@usa.doj.gov)>  
**Subject:** Re: Chen v. USA, 1:19-cv-45

Thank you so much. Have a great weekend.

- Michele Young

On Mar 29, 2019, at 2:57 PM, Michele Young <[michele@michelelyounglaw.com](mailto:michele@michelelyounglaw.com)> wrote:

Matthew,

We are looking forward to working with you.

Of course, we support your request for extension.

Michele and Peter,

Good morning. I hope you are both doing well.

Kevin and I are the assigned AUSAs for the Chen FTCA lawsuit.

We plan on seeking a three-week extension of time to file and Answer or Motion in response to Plaintiff's Complaint. Can you please let us know if you oppose that request? If you do not oppose the request, we will prepare a stipulation pursuant to local rules. We calculate the current answer deadline as April 5, so the proposed new deadline would be April 26.

If you have any questions or want to discuss, please feel free to call or email us at your convenience.

We look forward to working with you on this case.

Thanks!

Matt

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<Joint Stipulation for Extension.docx>